

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-21-SLR
	:	
JASON QUARLES,	:	
	:	
Defendant.	:	

**DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE  
OF SENTENCING HEARING**

Defendant, Jason Quarles, by and through his undersigned counsel, Edson A. Bostic, Federal Public Defender, hereby moves the Court for an Order continuing the Sentencing Hearing in this case.

In support of this motion, Mr. Quarles submits as follows:

1. Mr. Quarles is scheduled for sentencing before this Court on August 22, 2007. Sentence is to be imposed upon a conviction for uttering counterfeit securities in violation, of 18 U.S.C. § 513(a).

2. Current Counsel assumed direct responsibility for this matter on or about August 6, 2007. Current counsel, therefore, did not, himself, participate in the Presentence interview, nor was he involved in reviewing the Presentence Report prior to this time.

3. In subsequent discussions with Mr. Quarles, however, Current Counsel has determined that Mr. Quarles has various medical conditions which are important factors that should be considered at Sentencing. Upon learning of these medical issues, Current Counsel has requested a copy of Mr. Quarles' medical records to support his efforts at mitigation at Sentencing.

4. However, Current Counsel has been informed that the medical records will not be available prior to the present sentencing date. Because Mr. Quarles' medical condition is an important factor worthy of consideration under § 3553(a), Mr. Quarles is requesting a continuance of the sentencing hearing for approximately three weeks.

5. Current Counsel has made Beth Moskow-Schnoll<sup>1</sup>, Assistant United States Attorney, Counsel for the Government, and Jean Lubinsky, United States Probation/Pretrial Services Officer, aware of the need for these medical records and the filing of this motion, and they do not oppose the motion.

**WHEREFORE**, it is respectfully requested that this Court issue an Order continuing the Sentencing Hearing in this case for three weeks.

Respectfully Submitted,

/s/  
**EDSON A. BOSTIC**  
Federal Public Defender

Attorney for Defendant Jason Quarles

One Customs House  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
(302) 573-6010  
[ecf\\_de@msn.com](mailto:ecf_de@msn.com)

Dated: August 16, 2007

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<sup>1</sup>Attorney Beth Moskow-Schnoll will not be available from 3:00 p.m. on September 12, 2007, through September 14, 2007, due to observation of a religious holiday.